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18 *Attorneys for Defendant Barrick Goldstrike Mines, Inc.*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 LAWRENCE RYAN,
22 Plaintiff,
23 v.
24 BARRICK GOLDSTRIKE MINES, INC., a
25 foreign corporation,
26 Defendant.

27 CASE NO. 3:19-cv-286

28 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO PLAINTIFF'S
OPPOSITION TO SUMMARY
JUDGEMENT**

FIRST REQUEST

1 Pursuant to LR IA 6-1, Defendant Barrick Goldstrike Mines, Inc. (“Barrick”) and
2 Plaintiff Lawrence Ryan (“Ryan”), by and through their undersigned counsels of record, hereby
3 stipulate and respectfully request an Order granting this Stipulation to extend the deadline for
4 Barrick to file its response to Plaintiff’s opposition to Motion for Summary Judgment (ECF No.
5 29) from November 19, 2020, to December 3, 2020. This is the first request to extend this
6 particular deadline.

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8 Good cause exists to extend Barrick’s reply deadline from November 19, 2020, to
9 December 3, 2020. The parties previously stipulated to allow Plaintiff an additional month to
10 oppose the pending motion for summary judgment, thus, the Reply in Support of the Motion for
11 Summary Judgment is now due the same week that counsel for Barrick will be in depositions for
12 another case and also preparing for his daughter’s wedding. Furthermore, the following week is
13 the Thanksgiving holiday. Plaintiff does not oppose the short extension. This request for a two-
14 week extension is sought in good faith and not for purposes of undue delay.
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1 DATED this 10th day of November, 2020.

2 By: /s/ David C. Castleberry
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22 By: /s/ Mark L. Mausert (signed with permission)
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29 *Attorneys for Plaintiff*

30 IT IS SO ORDERED:



31 UNITED STATES DISTRICT JUDGE

32 Dated: 11/10/2020

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b) I certify that I am an employee of Manning Curtis Bradshaw & Bednar PLLC and that on the 10th day of November, 2020, a true and correct copy of **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND TO PLAINTIFF'S OPPOSITION TO SUMMARY JUDGEMENT** was transmitted via ECF to the following:

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